

**EXHIBIT 3**

**UNREDACTED VERSION  
OF DOCUMENT  
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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**NOTICE OF 30(B)(6) DEPOSITION OF  
PLAINTIFF WAYMO LLC**

Location: Goodwin Procter LLP  
135 Commonwealth Ave  
Menlo Park, CA 94025

Courtroom: 8  
Judge: Hon. William Alsup

TO: ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant OTTO TRUCKING LLC ("Otto Trucking"), will take the deposition upon oral examination of Plaintiff WAYMO LLC ("Waymo"). Pursuant to Fed. R. Civ. Proc. 30(b)(6), Waymo shall produce for deposition one or more officers, directors, managing agents, employees, or other designated persons who can testify on its behalf with respect to the topics set forth in the attached Schedule A, and the person(s) so designated shall be required to testify as to each of those matters known or reasonably available to the corporation. Waymo shall identify the person (or persons) designated to testify regarding each of the categories set forth in Schedule A, at least three (3) business days before the deposition begins. For each such person, Waymo shall designate the particular matters on which each such person will testify. Otto Trucking reserves the right to depose Waymo on further Rule 30(b)(6) topics as discovery progresses.

PLEASE TAKE FURTHER NOTICE the deposition will be before a court reporter authorized to administer oaths and will be recorded stenographically and by sound and video recording. The deposition may be recorded using real time instant visual display of testimony. Otto Trucking reserves the right to use the recorded deposition at trial.

Dated: July 31, 2017

By: /s/Neel Chatterjee  
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**SCHEDULE A**

**Definitions**

1. The terms “YOU” and “WAYMO” means Plaintiff Waymo LLC and its past and present agents, representatives, or attorneys, and all persons currently or previously under its control or acting or purporting to act on its behalf.

2. The term “UBER” means Defendant Uber Technologies, Inc. and its past and present agents, representatives, or attorneys, and all persons currently or previously under its control or acting or purporting to act on its behalf.

3. The term “OTTOMOTTO” means Defendant Ottomotto LLC. and its past and present agents, representatives, or attorneys, and all persons currently or previously under its control or acting or purporting to act on its behalf.

4. The term “OTTO TRUCKING” means Defendant Otto Trucking LLC. and its past and present agents, representatives, or attorneys, and all persons currently or previously under its control or acting or purporting to act on its behalf.

5. The term “LICENSE AGREEMENT” means the Software License Agreement entered into by OTTO TRUCKING and WAYMO on or about December 13, 2011.

6. The terms “and” and “or” shall mean “and/or.”

**Topics**

Pursuant to Fed. R. Civ. P. 30(b)(6), Waymo shall designate one or more corporate representatives to testify on the following topics:

1. Any investigation of the computers, devices, or activities of Mr. Levandowski or any employees who left Waymo for Uber, including any forensic investigation conducted by You and any information related to [REDACTED] data Gary Brown described in his declaration and deposition, any information related to [REDACTED] [REDACTED] Kristinn Gudjonsson described in his deposition, and all facts learned from any forensic investigation prior to July 1, 2016.

2. The SVN server, including what the server is, how it is administered, how it functions, how Google/Waymo employees used the SVN server, who had access to it, how the

SVN server is protected, and any automatic syncing or download features of the SVN server when used with Tortoise SVN client software.

3. The guidelines and playbooks used by the forensic security team.

4. The internal wiki or intranet site for Project Chauffeur, including any instructions on the site related to [REDACTED], use and installation of the Tortoise SVN client software, and use of any SVN servers.

5. The Project Chauffeur bonus plan, including structure of the bonus plan, the negotiations of the bonus plan, the reasons for creating the bonus plan, the valuation of Project Chauffeur, and any negotiations regarding that valuation.

6. The value of any purported trade secret You contend was misappropriated.

7. Your communications with Anthony Levandowski regarding any acquisition of or investment in any of his side projects or businesses, including any autonomous trucking related business.

8. Your document retention policy, including any policies regarding the retention or destruction of any metadata or logs from the SVN server, and the application of that policy, including which SVN logs were preserved as described by Mr. Nardinelli in his July 18, 2017 email sent at 9:40 p.m, as well as the same information for [REDACTED]

9. The disclosure of Your trade secrets to third parties, including any disclosures made at trade shows, conferences or other public fora where any LiDAR device was used or displayed, and in-store displays and advertisements by Google and/or Waymo vendors.

10. All measures taken by Google and/or Waymo to protect any trade secret Waymo claims was misappropriated by Otto Trucking and the compliance or noncompliance with such measures by current or former employees or vendors, such as whether such employees or vendors took LiDAR home to work on or as mementos, and any public disclosures of Your purported trade secrets.

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 601 South Figueroa Street, 41st Floor, Los Angeles, California 90017.

On **July 31, 2017**, I served the following documents by placing a true copy thereof in a sealed envelope(s) on the persons below as follows:

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☒ (E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction this service was made and that the foregoing is true and correct.

Executed on **July 31, 2017**, at Los Angeles, California.

Hong-An Vu  
(Type or print name)

/s/Hong-An Vu  
(Signature)